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Teck

PROGRESS REPORT NO. 139

TO: Monica Tonel, U.S. Environmental Protection Agency (EPA) – via Email
Kathryn Cerise, EPA – via Email

FROM: Kris McCaig, Teck American Incorporated (TAI)

Cc: Denise Mills, TAI – via Email

DATE: February 12, 2018

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 139 Month Ending January 2018

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technologies Evaluation Study (SATES) – Following the completion of Phase 1A field work in October, sample processing and analysis began and continued in the month of January. TAI has been in communication with Kira Lynch, Superfund Technology Liaison – Office of Research and Development office of Science and Policy and the SATES team regarding data reporting and planning technical analysis by the team.

Benthic Macroinvertebrate Tissue Study – At the time of writing TAI is in receipt of an email from EPA dated February 8, 2018 related to one final comment on the draft final DSR submitted to EPA on December 14, 2017. TAI will revised the small section of the DSR and work with EPA to finalize the report in February.

Plant Tissue Study – During the month of January, TAI continued work on development of the study data quality objectives, study design and the draft quality assurance project plan (QAPP) with EPA. At the time of writing, TAI submitted the draft QAPP to EPA and the Participating Parties on February 1, 2018 for review and comment.

Delineation of Upland Soil Site – TAI is in receipt of a letter from EPA dated January 22, 2018 with an attached table of EPA's responses to the issues raised by TAI in its dispute

of the level of effort for the background assessment. TAI is evaluating the letter and responses and will work with EPA to set up a meeting to discuss in the near future.

Baseline Ecological Risk Assessment (BERA) - TAI submitted a letter to EPA on December 22, 2017 with an attached technical memorandum titled Upper Columbia River Bioassay Data Analyses – Preliminary Results of the Concentration-Response Relationship Evaluation. The technical meeting planned for December 13, 2017 to discuss the approach and results was postponed until January 23-24, 2018 to allow EPA's technical team to review TAI's preliminary results. However, the January 23-24 meeting was also postponed due to travel restrictions and work interruptions at certain agencies and will be rescheduled for some time in April.

TAI received a letter from EPA dated January 8, 2018 (received via electronic mail January 9, 2018) notifying TAI that EPA is defining the upper reaches of the riverine portion of the UCR Site as a separable operable unit (OU). Attached to the letter was a Level of Effort (LOE) for Nature and Extent of Sediment Contamination in Upper Reach OU. TAI issued a Notice of Dispute letter to EPA on January 23, 2018 and K. McCaig and K. Cerise began the informal dispute resolution process. At the time of writing the informal dispute resolution deadline has been extended twice, first on February 5, 2018 and again on February 10, 2018 as documented in letters from EPA to TAI. The current deadline for informal dispute resolution or request for determination is February 16, 2018.

BERA Toxicity Reference Value (TRV) Development – During the month of January TAI and EPA coordinated to schedule a meeting on March 6, 2018 for TAI, EPA and the Participating Parties to discuss soil, sediment and porewater TRV development and chemicals of potential concern refinement for the BERA.

Human Health Risk Assessment (HHRA) – A call was held with EPA and TAI on January 9, 2018 to continue discussions around the Recreational Use Survey, Residential Soil Study letters to landowners, the updated conceptual site model, the chemicals of interest screen, the CCT Resource Use and Consumption Survey, and EPA's groundwater pathway assessment, and EPA's problem statement outline regarding the topic of northern pike in the UCR. On October 19, 2017 TAI submitted a letter to EPA titled "Additional Information on Teck American Incorporated (TAI) Technical Memo *Evaluation of Uncertainty in Daily Fish Consumption Metrics Generated from UCR Recreation Use Data (October 19, 2017)*." Based on discussion with EPA, TAI followed up with a letter dated November 17, 2017 with additional information on the uncertainty analysis. TAI is in receipt of an SRC memo titled "Draft Response to TAI Uncertainty Analysis Proposal" from EPA (via electronic mail on December 7, 2017) and is reviewing and evaluating. EPA will start identifying responses that would be considered outliers from the Recreation Use Survey and will begin making changes to the Data Analysis Report based on comments received, as appropriate.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.